

Purposes



- ⌘ Provide an overview of the changes to the CCR SR process for 2001-02
- ⌘ Provide an overview of the changes to the Verification processes for 2001-02



CCR Special Education Self Review

April 2000 Federal Visit Report



⌘ Visit CDE and districts during week of April 24, 2000 - to assess progress toward meeting a CAP submitted by CDE to OSEP.

⌘ Findings

☒ "...the CCR self-review, as designed and implemented during 1999-00 is not an effective tool for identifying and correcting noncompliance with all federal requirements and it will take significant revisions in both design and implementation for this component to be effective."

☒ The checklist does not probe all Part B requirements

☒ Items are unclear and vague

☒ Concern about whether district staff would provide an accurate and complete self assessment

☒ Confusion about who was to conduct a self review (or whether is required)

☒ Lacks incentives for accuracy and thoroughness

Federal Special Conditions 2000-01



- ⌘ By June 2001, CDE will demonstrate that it has revised each of the components of its integrated monitoring system ...so that they are effective in promptly, accurately and comprehensively identifying and correcting noncompliance
 - ☒ To the extent that CDE continues to use the CCR self-review as one of the primary components of its...monitoring system (QAP), CDE must review and where necessary, revise the process to ensure that:
 - ☒ The self review checklist covers all federal requirements...as set out in the 1999 final regulations;
 - ☒ The records reviewed are selected by a stratified random sample that will enable the district to examine compliance across all disabilities and all requirements;
 - ☒ Districts are thorough and accurate in their self review;
 - ☒ The self-review data and data from other QAP sources are integrated...; and
 - ☒ On an ongoing basis, CDE assesses the accuracy, thoroughness, reliability and validity of the process, assesses its impact on services to children with disabilities and makes any necessary changes.

OSEP Assessment of CDE Progress on 2000-01 Special Conditions

- ⌘ During 2000-01 OSEP made two visits to California, went on reviews, conducted their own reviews, and reviewed reports and documentation
 - ☒ Determined that CDE is able to identify systemic noncompliance through its monitoring procedures - onsite monitoring, CASEMIS, investigation of complaints. OSEP not retain special conditions in these areas.
 - ☒ CDE integrates components of QAP. OSEP not retain special conditions.
 - ☒ CDE not demonstrated sufficient progress in (1) ensuring effectiveness of Self Review, (2) LEAs meet Part B eligibility, (3) ensuring that noncompliance is corrected; and (4) provision of special education to children in adult correctional facilities.

Federal Special Conditions 2001-2002

⌘ General 2001-2002

- ☒ CDE Reports to OSEP 2x year
- ☒ CDE must ensure CCR SE SR is effective
 - ☒ **valid and reliable, accurate and comprehensive determinations of compliance with IDEA, Part B.**
 - ☒ **Provide OSEP a list of all districts conducting a self-review in 2000-2001.**
 - ☒ **CDE to provide OSEP analysis of 20 self-reviews (selected by OSEP)**
- ☒ CDE must ensure that any LEA eligible under Part B meets all eligibility requirements in Part B.
- ☒ Also provide OSEP
 - ☒ **evidence of CDE Enforcement activities**
 - ☒ **data regarding Verification Reviews (2001-2002) and follow up reviews (from 2000-2001)**

Where is this going?



⌘ Need to keep CCR SR

- ☒ Feds, legislature and advocates/stakeholders value the numbers reviewed and the certainty of the four year cycle
- ☒ Department values the division's participation in the department wide monitoring process

⌘ Need to refine it so that

- ☒ we can improve the accuracy and reliability of results and guarantee that it is comprehensive
- ☒ CDE expectations are clear - what is to be done and submitted
- ☒ the data is readily evaluated, assessed and combined with other information about the district

⌘ Need to use it to distinguish those districts that need attention with compliance issues from those that do not (need as much)

⌘ Need to use it to focus our review efforts in the areas needing attention

Where this is going.

- ⌘ Self review as a process is being moved more up front in our review processes
 - ☑ Verification - Self review is the primary methods for assessing student records and policies and procedures
 - ☑ Selection of Districts for Onsite Review - the CCR SR will be used as the primary screener for identification of districts for followup review (onsite and otherwise) for 2002-03.
- ⌘ Self reviews need to have a meaningful check on their reliability and thoroughness
 - ☑ Verification - Self review data will be compared to CDE review of a subset of files and items for the same children
 - ☑ CCR SR Evaluation includes a check on frequent NC items
- ⌘ CDE must use a consistent, comprehensive review of SR submissions and must document deficiencies in the review and correct them
- ⌘ CDE must track the findings of noncompliance from CCR SR, ensure that they are appropriately corrected and document that evidence of their correction was provided and reviewed.

Changes to CCR SE SR



Conducted in 2000-01

- 1) Student record review
- 2) Parent/Guardian Focus Group
- 3) IEP Implementation and Service Data

Conducted in 2001-02

- 1) Student record review
- 2) Parent/Guardian Focus Group
- 3) IEP Implementation and Service Data
- 4) Data examination of Class Size Reduction Program
- 5) Data examination of district KPIs

CCR SE SR Evaluation

Levels of Review



⌘ Required Contents -

- ☒ Did the district submit something in each of the required areas?

⌘ Analysis of Procedural Elements -

- ☒ Did the district conduct each of the review activities as specified by CDE?

⌘ Evaluation of Findings and Corrective Actions -

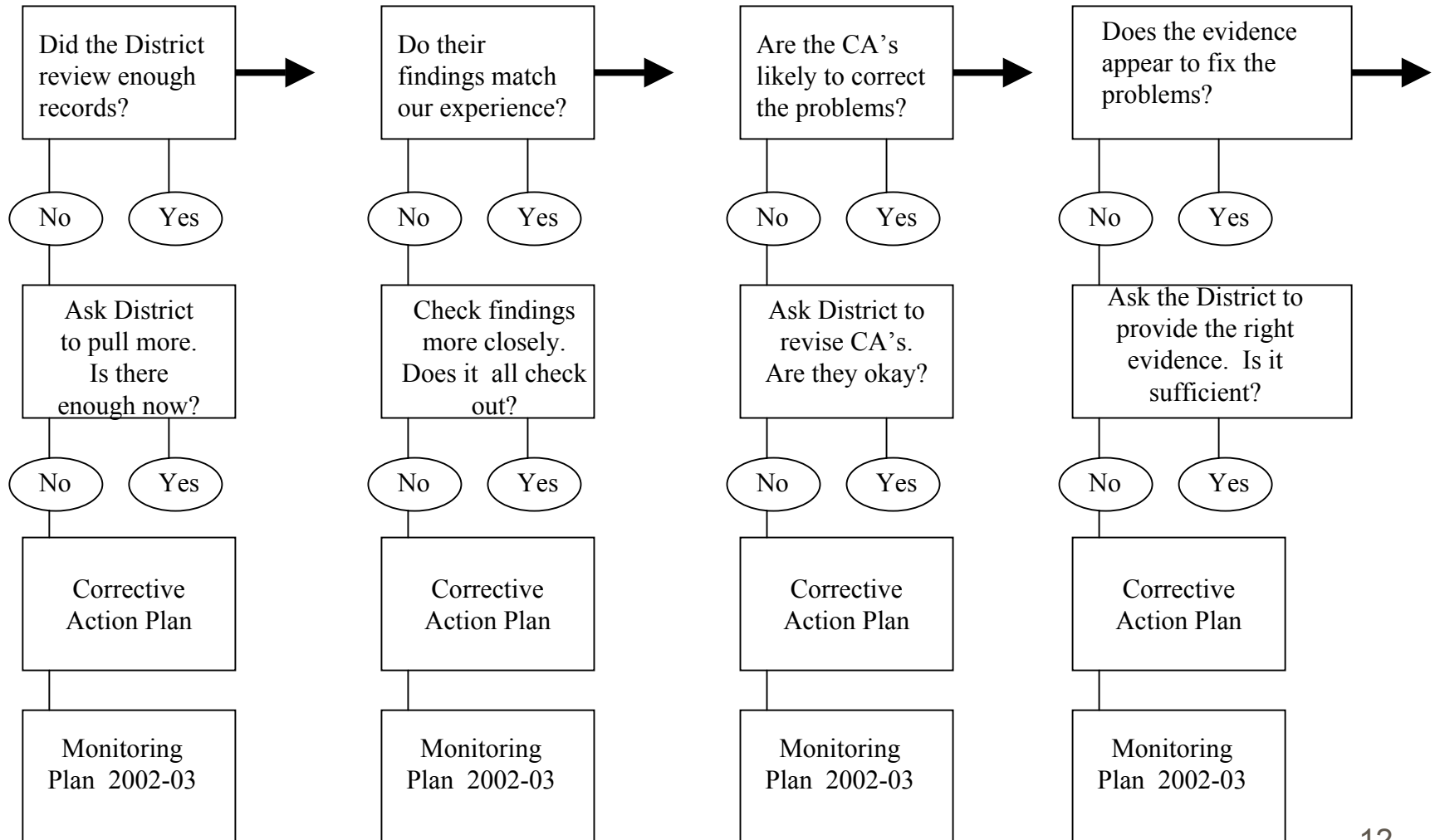
- ☒ Did the district overlook any areas of potential noncompliance that might have been investigated by CDE?
- ☒ Do the findings, corrective actions and evidence lead to lasting correction of noncompliance found during the review?

Consequences



- ⌘ So, what if the district does not complete an adequate self review?
- ⌘ Short answers - in hierarchical order
 - ☒ Discuss with your administrator
 - ☒ Ask the district to send more information, correct the deficiencies
 - ☒ Find them noncompliant and prepare a corrective action plan
 - ☒ Identify the district for review next year (2002-03 monitoring plan)

Longer Answer



What requirements are changing this year?

⌘ Record Reviews

- ☑ Number of records per site in small districts

⌘ Focus Groups

- ☑ Expectation for parent participation
- ☑ Alternative Parent Survey

⌘ Data Collection

- ☑ Master student list
- ☑ Master site list

⌘ Clarify expectations re: Findings, CA's and Evidence of Correction

⌘ Summary memo to districts and changes posted on web site

What the future brings



Longer, more intensive training

- ☒ Legal issues
- ☒ Findings
- ☒ Corrective Actions
- ☒ Evidence of Correction
- ☒ Data Entry and Analysis

Detailed follow-up on information submitted

Tighten up processes



Verification Reviews

Purpose of Verification



- ⌘ The purpose of verification is twofold:
 - ☑ To ensure that the data is accurate and is consistent with CASEMIS definitions and
 - ☑ To assess key compliance questions using a variety of assessment methodologies.

Verification Questions



- ⌘ Are the data that the LEA reports to the state consistent with information found in student records?
- ⌘ Does a review of student records and follow-up interviews with parents and staff indicated that the district is in compliance with state and federal laws at the student level?
- ⌘ Does the LEA implement policies, procedures and practices and maintain documentation that demonstrate compliance with the Individuals with Disabilities Education Act at the district level?
 - ☑ a) Does a review of LEA policies, procedures, records and other documentation indicate that the LEA is in compliance with state and federal laws and regulations?
 - ☑ b) Do interviews with parents, staff and administrators indicate that the LEA is implementing the requirements of IDEA?
- ⌘ Are selected students' Individualized Education Programs (IEPs) implemented as written?
- ⌘ Has the LEA corrected prior noncompliance items so that they do not reoccur?

District Selection 2001-02



⌘ Some districts eliminated from pool

☒ Verification in 1999-2000

☒ Verification in 2000-01

⌘ 44 Districts selected 2001-02

☒ 4 – CYA

☒ 8 – Lowest quartile of KPIs

☒ 32 - Random

Why is verification changing



⌘ Staff, district, and stakeholder input

- ☒ Focus review more
- ☒ Use parent input to design onsite activities
- ☒ Increase local capacity for, and activity with self review

⌘ State and federal requirements

- ☒ Integrate information sources more
- ☒ Probe more deeply into “big ticket items”

⌘ Fiscal constraints

- ☒ Reduce number of trips
- ☒ Reduce number of days onsite

Change in process from prior years

PAST

- ⌘ **District Contact**
- ⌘ **Monitoring Plan Meeting**
 - ☐ Review Data
 - ☐ Review Compliance History
 - ☐ Generate Monitoring Plan
- ⌘ **Onsite Activities**
 - ☐ Training
 - ☐ Record Reviews
 - ☐ Policy/Procedures/Forms Review
 - ☐ Parent Input Meeting
 - ☐ Interviews/Site Visits
- ⌘ **Post Review Meeting**
- ⌘ **Report**
- ⌘ **Followup Visits**

NEW

- ⌘ **District Contact**
- ⌘ *Regional Training*
- ⌘ *Verification Self Review (VSR)*
 - ☐ *Records*
 - ☐ *Policies/Procedures Forms*
 - ☐ *Send info to CDE*
- ⌘ **Parent Input Meeting**
- ⌘ *Office Based Review (OBR)*
- ⌘ **Monitoring Plan Meeting**
 - ☐ *Review VSR/OBR Data*
 - ☐ *Review Parent Input*
 - ☐ *Review CASEMIS/KPI Data*
 - ☐ *Review Compliance History*
 - ☐ *Generate Monitoring Plan*
- ⌘ **Onsite Activities**
 - ☐ *Interviews/Site Visits*
 - ☐ *Other per Monitoring Plan*
- ⌘ **Post Review Meeting**
- ⌘ **Report**
- ⌘ **Followup Visits**

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Current Concerns



⌘ Accuracy of Verification Self Review

- ☒ Increased training – Two day
- ☒ Second reads in training
- ☒ Office Based review / double check

⌘ Consistency in development of Monitoring Plans

- ☒ Investigation methods database piloted this year

⌘ Turn around of reports

- ☒ Staff complete report before starting next review